

## **Symbiotic Strategies, LLC**

26 Winton Road • Meredith, New Hampshire 03253 • USA

May 2, 2005

California Energy Commission  
Dockets Unit  
Attn: Dockets 04-IEP-1E, 04-DIST-GEN-1  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

<b>DOCKET</b> 04-IEP-1 E
<b>DATE</b> MAY 02 2005
<b>RECD.</b> MAY 02 2005

04-DIST-GEN-1

- Re: • Docket **04-IEP-1E**, Achieving the Preferred Loading Order White Paper  
• Docket **04-DIST-GEN-1**, Order Instituting Investigation on Exploring Issues  
Associated with Implementation and Distribution Planning of Distributed  
Generation  
• 2005 Energy Report – CHP Workshop – April 28, 2005

Dear Sirs:

On behalf of my client Primary Energy and in the interest of using energy far less wastefully and more cleanly in California and the nation, I am pleased to submit these comments in support of the California Energy Commission's efforts in the above-referenced dockets and report.

Headquartered in Oak Brook, Illinois with combined heat and power (CHP) distributed generation (DG) facilities in San Diego and Oxnard, California, Primary Energy specializes in recycling waste energy to produce clean and affordable heat and power. Recycled energy is (1) electricity or steam produced from exhaust heat from any commercial or industrial process; (2) waste gas or industrial tail gas that would otherwise be flared, incinerated or vented; and (3) electricity or equivalent mechanical energy extracted from a pressure drop in any gas, excluding any pressure drop to a condenser that subsequently vents the resulting heat. Sited at host facilities, recycled energy is always DG, thus reducing line losses and enhancing system reliability and security. Moreover, recycled energy generally requires no additional fuel, creates no additional emissions, and helps host manufacturers become and remain more competitive. The attributes, applications, and opportunities associated with recycled energy are detailed much more fully in the attached materials, principally authored by Primary Energy's Chairman and CEO, Thomas R. Casten.

Primary Energy believes that the multiple benefits of recycled energy to California's citizens, economy, and environment warrant particularly favorable treatment for such installations in the Preferred Loading Order and through inclusion in other incentive programs, such as classification as RPS-certified and SEP-eligible facilities.

Primary Energy commends the Commission for opening this challenging but crucial docket, and looks forward to assisting in any way we can. Please contact me at 603-279-0770 or [kcolburn@nescaum.org](mailto:kcolburn@nescaum.org) if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Kenneth A. Colburn". The signature is written in a cursive, flowing style.

Kenneth A. Colburn

Attachments:

- Casten, Thomas R., and Brennan Downes, Economic Growth and the Central Generation Paradigm, USAEE *Dialogue*, August 2004.
- Casten, Thomas R., and Brennan Downes, Critical Thinking About Energy: The Case for Decentralized Generation of Electricity, *Skeptical Inquirer*, January-February 2005.
- Casten, Thomas R., Energy Recycling: The Missing Link, *Power & Energy Continuity*, March 2004.
- Casten, Thomas R., and Martin J. Collins, Recycled Energy: An Untapped Resource, April 19, 2002.
- Bailey, Owen and Ernst Worrell, Clean Energy Technologies: A Preliminary Inventory of the Potential for Electricity Generation (in Draft), LBNL, July 2004.